

Division Director

## DIVISION OF OIL, GAS AND MINING

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April 9, 1993

TO:

Minerals File

FROM:

Tony Gallegos, Reclamation Engineer

RE:

Site Inspection, AKZO Salt, Inc., Timple Solar Ponds Mine,

M/045/030, Tooele County, Utah

Date of Inspection:

April 8, 1993

Time of Inspection:

1330 - 1600

Conditions:

fair skies, light breeze

Participants:

Dan Bauer, AKZO Salt, Inc.; Tony Gallegos, and Wayne

Hedberg, DOGM

Purpose of Inspection: To discuss permitting issues raised in the Division 12/22/92

letter and examine remaining areas of concern at the site.

Upon arrival, Mr. Bauer gave us an overview of the facilities expansion currently underway. Construction of the bulk storage and processing plant was taking place. The new covered bulk storage/processing facilities will allow AKZO to operate continuously and more efficiently, independent of the weather. Mr. Bauer pointed out that several features at the site were not included on the drawing currently filed with the Division. In particular, the new general office building near the main entrance and railroad crossing, and the addition to the railroad spur. He informed us that the small rotary kiln currently at the site was being used until the new processing facilities were complete.

The first item of discussion was which roads should be granted a variance from reclamation because of a post-mining land use. This is directly related to which facilities should be granted a variance from reclamation because they have a viable post-mining land use. Mr. Bauer felt that at the time of final reclamation there would be sufficient demand, for the maintenance facilities, truck scales, and storage/processing facilities. He pointed out that the existing utility infrastructure and freeway access would make the site attractive to another salt operation, a trucking operation, or distribution center.



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Mr. Bauer felt that not having an agreement with a party interested in the post-mine use of the facilities, should not be the reason for the Division denying the facilities a variance from reclamation and bonding. The anticipated mine life is at least 50 years at the present time. We agree that few (if any) parties would be willing to sign an agreement committing themselves to something that would happen 50 years in the future. He indicated that he had modeled the AKZO permit application after the Great Salt Lake Minerals application which included post-mining land use for a portion of their facilities without having a post-mine agreement with another party. We suggested a possible compromise might be to condition the permit approval such that AKZO would agree to reclaim any/all remaining facilities, if there is no buyer at the time of final reclamation. We agreed to discuss this compromise option with the Division's legal counsel.

The next item involved AKZO's commitment to remove residual salt from the Plot C area and the import of borrowed topsoil material if necessary. We asked Mr. Bauer where the possible borrow sites were located. He felt that the closest borrow site would be some small islands in the evaporation pond network (@1 mile) north of the processing facilities area. He was not sure if their current permits allowed them to use this material, but he would check into it. The Division will need to decide on the amount (depth) of topsoil material which should be placed on the area. Mr. Bauer indicated that if a proposed expansion were to take place, AKZO may also need to place borrowed topsoil on Plot F.

The next item involved the control of surface runoff in the salt storage, processing and loadout areas. Mr. Bauer informed us that the existing gradient causes the area to generally drain to the northeast toward their salt ponds. A canal along the eastern perimeter of the property collects any site runoff or lake waters. Upon inspection of the salt washing area it was suggested that AKZO create a berm or trench near the eastern fence line to keep the salts from migrating onto the Timpie Wildlife Refuge. Mr. Bauer indicated that this could easily be done with a small backhoe.

The next item involved the proposed seed mix for revegetation of the site. The Division's 12/22/92 letter suggested some additional species and seeding rates. We informed Mr. Bauer that the Division would use photographs taken during this site inspection to reevaluate the proposed seed mix and rate. Principally saltbush, shadscale, and a couple unknown forbs and grasses were noted during our inspection on the adjacent undisturbed area due east of the processing facilities area.

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The next item involved the reclamation surety. We informed Mr. Bauer that the reclamation surety estimate may need to be modified to reflect the site features not previously included. One item not given much attention was the fuel facility. We requested that AKZO provide us with a spill prevention and cleanup plan, as well as some additional information describing the proposed facility. He indicated that he was working on this item in preparation for their Storm Water permit and saw no problem in providing the information requested. We asked that a new version of the "SWPRF Reclamation Plan" drawing be modified to include these new features as well as locations of the section, township, and range. Mr. Bauer was given an edited version of their Reclamation Contract and Surety Bond forms for review and correction.

In conclusion, it was believed that the Division and AKZO may be able to resolve any remaining permitting issues in time for the May 1993 Board Hearing.

jb

cc:

Dan Bauer, Akzo Salt

Jerry Mansfield, State Lands

Lowell Braxton, DOGM

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